

**From:** [Hebert, John](#)  
**To:** [Bressant, Janet](#)  
**Cc:** [Johnson, Zebora](#)  
**Subject:** FW: EPA Reg. No. 90072-E  
**Date:** Thursday, March 11, 2021 12:11:51 AM  
**Attachments:** [EPA Label 95700-E 1-21-21.pdf](#)  
[CSF 1-21-21 300.pdf](#)  
[COA Lots 6-8 1-21-21.pdf](#)

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Sorry that I didn't see this before I sent my other email.

John

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**From:** Johnson, Zebora <[Johnson.Zebora@epa.gov](mailto:Johnson.Zebora@epa.gov)>  
**Sent:** Wednesday, March 10, 2021 8:54 AM  
**To:** Hebert, John <[Hebert.John@epa.gov](mailto:Hebert.John@epa.gov)>  
**Subject:** FW: EPA Reg. No. 90072-E

John:

I am forwarding you this email pertaining to your request for this file.

Zebora

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**From:** Kevin Kutcel <[kevinkutcel@gmail.com](mailto:kevinkutcel@gmail.com)>  
**Sent:** Thursday, January 21, 2021 2:33 PM  
**To:** Laniyan, Ibrahim <[Laniyan.Ibrahim@epa.gov](mailto:Laniyan.Ibrahim@epa.gov)>  
**Cc:** Johnson, Zebora <[Johnson.Zebora@epa.gov](mailto:Johnson.Zebora@epa.gov)>; Hebert, John <[Hebert.John@epa.gov](mailto:Hebert.John@epa.gov)>  
**Subject:** RE: EPA Reg. No. 90072-E

Dr. Laniyan,

Thank you for talking with me today. Per our conversation, attached is a revised CSF and label.

Also, regarding your other questions that you asked on your 1/14/21 e-mail and the phone conversation we had on 1/14/21:

1. The fabric treatment rate is 98.9 gallons of solution per 694 lbs fabric. Attached are revised Certificates of Analysis in which the fabric quantity treated and total chemical weight (and volume) are stated for Lots 6-8.
2. The concentration of the treating solution is 9.7% by weight.
3. The percentage weight of active ingredients added to the test fabrics before washing is 1.38% (1.38lbs/100 lbs treated fabric)

Fabric Weight Before Treatment      85.90 lbs

Fabric Weight After Treatment (dry) 87.28 lbs  
Weight of Active Ingredients 1.38 lbs

Please let me know if you have any other questions.

Warm Regards,

Kevin Kutcel  
KRK Consulting LLC  
5807 Churchill Way  
Medina, OH 44256  
440-263-7305  
Fax: 440-398-0476

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**From:** Laniyan, Ibrahim <[Laniyan.Ibrahim@epa.gov](mailto:Laniyan.Ibrahim@epa.gov)>  
**Sent:** Thursday, January 14, 2021 6:50 PM  
**To:** Kevin Kutcel <[kevinkutcel@gmail.com](mailto:kevinkutcel@gmail.com)>  
**Cc:** Johnson, Zebora <[Johnson.Zebora@epa.gov](mailto:Johnson.Zebora@epa.gov)>  
**Subject:** RE: EPA Reg. No. 90072-E

In addition to revising the CSF and the label, please provide fabric treatment rate, X volume / y weight of fabric) and percentage weight of added weight to the **test fabrics** before washes (just like in the absorption study)

Thank you

Ibrahim Laniyan, Ph.D.  
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**From:** Kevin Kutcel <[kevinkutcel@gmail.com](mailto:kevinkutcel@gmail.com)>  
**Sent:** Thursday, January 14, 2021 5:12 PM  
**To:** Laniyan, Ibrahim <[Laniyan.Ibrahim@epa.gov](mailto:Laniyan.Ibrahim@epa.gov)>  
**Subject:** FW: EPA Reg. No. 90072-E

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**From:** Kevin Kutcel <[kevinkutcel@gmail.com](mailto:kevinkutcel@gmail.com)>

**Sent:** Tuesday, December 22, 2020 4:13 PM

**To:** 'Laniyan, Ibrahim' <[Laniyan.Ibrahim@epa.gov](mailto:Laniyan.Ibrahim@epa.gov)>

**Cc:** 'Hebert, John' <[Hebert.John@epa.gov](mailto:Hebert.John@epa.gov)>; 'Johnson, Zebora' <[Johnson.Zebora@epa.gov](mailto:Johnson.Zebora@epa.gov)>

**Subject:** EPA Reg. No. 90072-E

Dr. Laniyan,

Thank you again for talking with me on 12/14/20. Per our conversation, I immediately sent you the absorption study (MRID No. 51206109) which apparently you had not seen in your initial review. In our conversation, you said that once you looked at the absorption study, you would call me to discuss the CSF. I understand now from Mr. John Hebert that you are on holiday. To move things along, attached is a revised label and CSF that I believe will resolve the issues in your efficacy review. I revised the CSF so that the LCL matches the COA in the efficacy study and the label has been revised to match the nominal concentration. I look forward to discussing the matter with you once you return from your holiday.

Warm Regards,

Kevin Kutcel  
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5807 Churchill Way  
Medina, OH 44256  
440-263-7305  
Fax: 440-398-0476